REMARKS

This Amendment, submitted in response to the Office Action dated November 21, 2007, is believed to be fully responsive to each point of rejection raised therein. Accordingly, favorable reconsideration on the merits is respectfully requested.

I.   Summary of Final Office Action

Claims 1-15, 17, 19 and 21 are all the claims pending in the application.

Claim 1 and dependent claims 2-10 stand rejected under 35 U.S.C. § 101 as claiming allegedly non-statutory subject matter (software).

Claims 1-8, 11-15 stand rejected under 35 U.S.C. § 102(e) as allegedly being anticipated by Mokuya et al. (U.S. Pub. 2003/0046381; hereinafter "Mokuya").

Claims 9, 10, 17, 19 and 21 stand rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Mokuya in view of Froyd et al. (U.S.P. 6,725,233; hereinafter "Froyd").

II.   Amendments to Specification and Claims

Applicant amends the specification to comply with the requirements of 37 C.F.R. § 1.77(b).

Applicant amends claims 1-15 to more clearly define the subject matter respectively claimed therein based on the specification. In particular, claims 1 and corresponding claim 12 are amended at least based on the only figure of the application, line 27 of page 1, line 8 of page 3, line 9 of page 8 through line 4 of page 9 of the specification.

III.   Analysis of § 101 Rejection

As claim 1 is amended to include two distinct elements, each element performing its own specific function, the claim is now more clearly defined as an apparatus claim complying with statutory subject matter.

Applicant respectfully requests withdrawal of the rejection in this regard.

IV.   Analysis of § 102 Rejection

In rejecting claim 1, the Examiner still alleges that all elements of the claimed system are disclosed by Mokuya's network device management system.

Applicant respectfully submits that the claim as amended is distinguished at least because Mokuya does not disclose the claimed automatic descriptor unit that: (i) designate an object plant when the object plant joins a communication network; and (ii) the designation of the object plant is performed by using first data configured to designate a plurality of types of plant.

Mokuya is directed to conversion of a management information database definition file 21a (hereafter "MIB file") into a tag-structured file 23a of an ordinary format such as XML to avoid complicated modification of an MIB file of a network device 10a into a format unique to the management system, whenever the MIB file is updated by a manufacturer of the network device. See Fig. 1 of Mokuya. By contrast, the present application is directed to incorporating a plant (e.g., a network device) into a network when the plant joins the network. Thus, Mokuya does not disclose an element corresponding to the claimed automatic descriptor that designates the network device 10a when the network device 10a joins the network.

In addition, the claimed automatic descriptor is further characterized by designating an object plant using first data that is able to designate a plurality of plants (network devices) while

11

a non-automatic (conventional) descriptor is able to designate only one specific plant. This characteristic of the automatic descriptor is not disclosed in Mokuya.

The Examiner appears to allege that this aspect is taught by the "data structure describing MIB in ASN1 format" (i.e., the MIB file) or the converted tag-structured file 23a of Mokuya. However, the data structure describing MIB in ASN1 format (MIB file 21a) may at best correspond to the MIB definition recited in the claim, but may not correspond to the automatic descriptor which is clearly a separate element in the system. In addition, since the converted tag-structured file of Mokuya is still an MIB file even though it is no more in ASN1 format after conversion, the converted tag-structured file cannot correspond to the automatic descriptor. Further, since the automatic descriptor accesses the field of the MIB definition (corresponding to the MIB file of Mokuya), the automatic descriptor is clearly differentiated from the MIB file of Mokuya in claim recitation. Moreover, since the MIB file of Mokuya only defines the structure of the MIB of the network device 10a, the MIB file itself cannot perform the function of delivering data representative of a value of any field contained in the management information database in the network device 10a.

Moreover, assuming *arguendo* that the MIB file of Mokuya may be able to designate the network device 10a, there is no teaching or suggestion that the MIB file uses first data as claimed to designate the network device 10a. That is, the MIB file is not configured to designate a plurality of types of network device, while the automatic descriptor is able to do the same.

Accordingly, the claimed network management system (claim 1) and corresponding method (claim 12) would not have been anticipated by Mokuya at least because the reference fails to teach the automatic descriptor as recited in the claim.

Claims 2-8, 11 and 13-15 should be allowable at least due to their dependencies and their

additionally recited elements therein.

V.   Analysis of § 103 Rejection

Applicant respectfully submits that claims 9, 10, 17, 19 and 21 should be allowable at

least due to their dependencies and their additionally recited elements therein since Froyd does

not make up for the deficiencies of Mokuya.

VI.   Conclusion

In view of the above, reconsideration and allowance of this application are now believed

to be in order, and such actions are hereby solicited. If any points remain in issue which the

Examiner feels may be best resolved through a personal or telephone interview, the Examiner is

kindly requested to contact the undersigned at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue

Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any

overpayments to said Deposit Account.

Respectfully submitted,

Seunghee Park
Registration No. 60,719

SUGHRUE MION, PLLC
Telephone: (202) 293-7060
Facsimile: (202) 293-7860

WASHINGTON OFFICE
23373
CUSTOMER NUMBER

Date: February 27, 2008